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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 REBECCA LEMPERLE, individually,
13 Plaintiff,
14 vs.
15 VINCENT TJOTA, individually; DOES I-X,
16 and ROE CORPORATIONS I-X, inclusive,
17 Defendants.

CASE NO.: 2:18-cv-00202-JCM-VCF

18
19 **STIPULATION AND ORDER FOR GOOD FAITH SETTLEMENT AND CONTINUE**
20 **TRIAL SETTING PENDING SETTLEMENT DOCUMENTS**

21 Pursuant to the Status Conference on September 18, 2023, before Judge James C.
22 Mahan, and the Court's Minutes (ECM No. 156), the parties have entered into a good faith
23 settlement for all claims in their entirety. See, NRS 17.245. The Plaintiff's attorneys have
24 represented they are waiting to resolve any statutory liens from United Healthcare
25 Community Plan of Nevada; Nevada Medicaid; Health Plan of Nevada (HPN); and/or
26 Centers for Medicare & Medicaid Services (CMS). Defendant requested a letter from all
27 statutory lien holders for their settlement of the liens, with payment instructions from those
28 lien holders and separate settlement checks for their portion of the settlement proceeds.

1 Pursuant to the Court's request, the attorneys submit the Stipulation to vacate the
2 current trial date and continue the trial setting until March, 2024; and therefore

3 Pursuant to the Court's Minutes (ECM No. 156), the parties will submit a Joint Status
4 Report by Friday, November 17, 2023.

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6 Respectfully Submitted,

7 DATED: September 25, 2023.

8 THE POWELL LAW FIRM

9
10 By /s/ Tom W. Stewart
11 PAUL D. POWELL
12 Nevada Bar No. 007488
13 THOMAS W. STEWART
14 Nevada Bar No. 014280
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Attorneys for Plaintiff
REBECCA LEMPERLE

15 DATED: September 25, 2023.

16 LEWIS BRISBOIS BISGAARD & SMITH LLP

17
18 By /s/ Josh Cole Aicklen
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ORDER

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the parties have entered into a good faith settlement pursuant to NRS 17.245; and therefore

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the jury trial on October 16, 2023 has been VACATED and continued until after March 2024; and

IT IS FURTHER ORDERED, ADJUDGED AND DECREED the parties shall submit a Joint Status Report on settlement documents by Friday, November 17, 2023.

IT IS FURTHER ORDERED that the trial currently set for October 16, 2023, is hereby continued to March 25, 2024 at 9:00 a.m.; and the calendar call currently set for October 11, 2023, is hereby continued to March 20, 2024 at 1:30 p.m.

DATED: September 25, 2023.


UNITED STATES DISTRICT JUDGE

Respectfully submitted by:

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Josh Cole Aicklen

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